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VIA ECFS

Federal Communications Commission
445 12th Street, SW
Washington DC 20554

RE: Initial Comments (MB Docket No. 17-105)

Dear Madam Secretary,

Meredith Corporation's Local Media Group ("Meredith"), which includes 17 television stations reaching 11 percent of U.S. households, applauds the Commission's efforts to "to eliminate or modify regulations that are outdated, unnecessary or unduly burdensome." Meredith values its commitments to localism and the public interest, but at the same time encourages the Commission to review "busywork" requirements and modernize posting and communication requirements for the digital age.

Meredith, however, asks that the Commission focus this proceeding on easy-to-fix "regulatory underbrush" without wading into thorny areas of Commission law and policy like retransmission consent, ownership, or spectrum licensing. Those types of issues have their own dockets and own timetables, and should not get in the way of common sense approaches to benefit the public, the Commission, and the industries it regulates.

Reducing Busywork

Meredith agrees with Commissioner O'Rielly that the Commission's forms need a fresh review. As he notes, the Commission can often achieve the same result with far less burden on the public, the Commission, or industry players. Meredith notes that the specific ideas of having only stations paying an Ancillary DTV Fee file a form or reviewing EEO reports already in the online public inspection file rather than via a "Mid-Term Report" should be easy for the Commission to implement under its broad procedural authority.

Surely, the same thought process could apply to a variety of Commission forms across different services, making the forms not only easier to file, but also easier for a member of the public to research and understand. As Commissioner Clyburn notes, there may be "a better, more efficient way to achieve a particular goal for the benefit of stakeholders, consumers, and the Commission."

Furthermore, the Commission should take this opportunity to review the underlying questions and answers in its many forms to ensure they are still relevant to the public interest and

not unduly burdensome for the Commission and regulated parties. For example, the Commission's "KidVid" form for children's programming often exceeds dozens of pages per station, yet provides little value to a parent in an on-demand world. Parents are simply not checking an obscure form on FCC.gov at the end of a quarter to see if a program was preempted or to get a description of a program. The FCC could instead rely upon basic certifications from television stations as evidence of compliance with the children's television programming rules, which would save countless hours of FCC staff time and television station personnel time.¹

Communicating with the Public Electronically

The FCC has made great strides in communicating with the public online, whether by the redesigned FCC.gov or the online public inspection file. The FCC's rules, however, still require a variety of paper notices that would be unlikely to inform the public and cause unnecessary expense. The newspaper public notice and paper retransmission consent election notices highlighted by Commissioner O'Rielly are stark examples, but the Commission would surely find many more upon deep review. Meredith agrees with Chairman Pai that now is the time to overcome "regulatory inertia" and consider methods and processes that may not have existed at the time of implementation of today's rules and procedures.

Focus on Underbrush, Not Policy

The Commission should seize this opportunity to holistically review the paperwork and communications requirements of its rules. It would be a shame to see progress in those areas hijacked by broader policy questions.

Multichannel Video Programming Distributors will surely use this proceeding to (again) assail the retransmission consent rules despite the fact that the Commission has definitively resolved such issues. Others may attempt to use this proceeding to argue over spectrum allocation. Still others may comment on substantive rate regulation. These policy debates have their time and place, but should not stop the Commission from the admirable task of reducing costs on the Commission, its staff, industry parties, and ultimately the United States taxpayer and consumer.

Very truly yours,



Joshua N. Pila

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¹ Meredith also supports the comments of the National Association of Broadcasters, including in particular the discussion of the children's television rules therein.